

1 JOHN HOUSTON SCOTT SBN 72578
2 LIZABETH N. deVRIES SBN 227215
3 The Scott Law Firm
4 1375 Sutter St, Suite 222
5 San Francisco, CA 94109
6 Telephone: (415) 561-9600
7 Facsimile: (415) 561-9609

8 Attorneys for Plaintiff
9 KATHY DEOCAMPO

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 KATHY DEOCAMPO,

13 Plaintiff,

14 v.

15 CALIFORNIA DEPARTMENT OF
16 CORRECTIONS, EDWARD S.
17 ALAMEIDA, JR., JEANNE S.
18 WOODFORD, AND DOES 1-25,
19 INCLUSIVE,

20 Defendants.

Case No. C 04-03018 MMC

STIPULATION REQUESTING
ADDITIONAL 30-DAY CONTINUANCE
OF CASE MANAGEMENT CONFERENCE
AND [PROPOSED] ORDER

Date: September 23, 2005

Time: 10:30 a.m.

Courtroom: 7

Judge: Honorable Maxine M. Chesney

21 Pursuant to the Court's Order and Civil L. R. 16-9, the parties jointly submit this
22 Stipulation requesting a 30-day continuance of the Case Management Conference on the grounds
23 that the related Worker's Compensation case has a trial date of September 27, 2005 and that all
24 parties are in the process of negotiating in good faith to reach a global settlement of all of
25 plaintiff's claims

26 DESCRIPTION OF THE CASE

27 Plaintiff was an employee for the California Department of Corrections, and most

recently was employed as a Correctional Case Records Analyst at San Quentin State Prison. The plaintiff, Kathy DeoCampo, filed this lawsuit on July 26, 2004, alleging retaliation in violation of Title VII, 42 U.S.C. § 2000(e), retaliation for First Amendment activities under 42 U.S.C. § 1983 and pendent claims under California Government Code §§ 12940, et seq. The defendants answered on August 18, 2004.

The plaintiff's related Workers' Compensation claim is schedule for trial on September 27, 2005. This Court granted a stay in this action and continued the last Case Management Conference so that the parties could report on the state Workers' Compensation proceedings.

STIPULATION


Given that the parties continue to be engaged in good faith settlement negotiations. There is a September 27, 2005 trial date in the plaintiff's Workers' Compensation case. The parties respectfully request this Court grant an additional stay of 30 days to October 21, 2005.

RESPECTFULLY SUBMITTED,

THE SCOTT LAW FIRM

DATED: September 15, 2005

By:


JOHN HOUSTON SCOTT
Attorney for Plaintiff

BILL LOCKYER
Attorney General of the State of California
FIEL D. TIGNO
Deputy Attorney General

DATED: September __, 2005

By:

FIEL D. TIGNO
Deputy Attorney General
Attorney for Defendants

1 recently was employed as a Correctional Case Records Analyst at San Quentin State Prison. The
2 plaintiff, Kathy DeoCampo, filed this lawsuit on July 26, 2004, alleging retaliation in violation of
3 Title VII, 42 U.S.C. § 2000(e), retaliation for First Amendment activities under 42 U.S.C. § 1983
4 and pendent claims under California Government Code §§ 12940, et seq. The defendants
5 answered on August 18, 2004.

6 The plaintiff's related Workers' Compensation claim is schedule for trial on September
7 27, 2005. This Court granted a stay in this action and continued the last Case Management
8 Conference so that the parties could report on the state Workers' Compensation proceedings.

9 **STIPULATION**

10 Given that the parties continue to be engaged in good faith settlement negotiations. There
11 is a September 27, 2005 trial date in the plaintiff's Workers' Compensation case. The parties
12 respectfully request this Court grant an additional stay of 30 days to October 21, 2005.

13 **RESPECTFULLY SUBMITTED.**

14 **THE SCOTT LAW FIRM**

15
16 DATED: September 15, 2005

17 By: 

JOHN HOUSTON SCOTT
Attorney for Plaintiff

18 **BILL LOCKYER**
19 Attorney General of the State of California
20 **FIEL D. TIGNO**
Deputy Attorney General

21 DATED: September 16, 2005


22 By: 

FIEL D. TIGNO
23 Deputy Attorney General
24 Attorney for Defendants
25
26

ORDER

IT IS HEREBY ORDERED that the Case Management Conference set for September 23, 2005 be continued ~~for 30 days to October 21, 2005~~ ^{December 9} at 10:30 a.m. A joint case management statement shall be filed no later than 7 days before the new Case Management Conference.

DATED: September 19, 2005



HON. MAXINE M. CHESNEY
JUDGE OF THE
UNITED STATES DISTRICT COURT